

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

United States Courts
Southern District of Texas
FILED

NOV 07 2019

David J. Bradley, Clerk of Court

UNITED STATES OF AMERICA

v.

JAMES RAY BUNN
Defendant

§
§
§
§
§
§

JUDGE

Hittner

19-822

INDICTMENT

THE GRAND JURY CHARGES THAT:

INTRODUCTION

At all times material to this Indictment, Subway, is a franchisee operated sandwich restaurant-chain headquartered in Milford, Connecticut, United States and engaged in the business of purchase and sales of food and consumer goods inside the United States and internationally which are shipped in interstate commerce and which affect interstate commerce.

COUNT ONE

Title 18, United States Code, §§ 1951(a)-Interference with Commerce by Robbery

On or about July 14, 2019, in the Houston Division of the Southern District of Texas,

JAMES RAY BUNN

herein defendant, did knowingly and intentionally obstruct, delay, and affect interstate commerce and the movement of articles and commodities in commerce by means of robbery, as the terms “commerce” and “robbery” are defined in Title 18, United States Code, §§ 1951(b)(1) and (b)(3), in that the defendant did unlawfully take and obtain the property of Subway, located at 9251 Gulf Freeway, Houston, Texas, which was in the possession and custody of an employee of Subway, namely, United States currency, by means of actual and threatened force, violence, and fear of injury to those in lawful possession of those items.

In violation of Title 18, United States Code, §§ 1951(a).

COUNT TWO

Title 18, United States Code, §§ 924(c)(1)(A) -
Use, carry and brandish of a firearm during and in relation to a crime of violence

On or about July 14, 2019, in the Houston Division of the Southern District of Texas,

JAMES RAY BUNN

herein defendant, did knowingly carry, use and brandish a firearm, namely, a handgun, during and in relationship to a crime of violence for which he may be prosecuted in a court of the United States, that being Interference with Commerce by Robbery, as alleged in Count One.

In violation of Title 18, United States Code, §§ 924(c)(1)(A)(ii),(3)(A).

COUNT THREE

Title 18, United States Code, §§ 1951(a)-Interference with Commerce by Robbery

On or about July 14, 2019, in the Houston Division of the Southern District of Texas,

JAMES RAY BUNN

herein defendant, did knowingly and intentionally obstruct, delay, and affect interstate commerce and the movement of articles and commodities in commerce by means of robbery, as the terms “commerce” and “robbery” are defined in Title 18, United States Code, §§ 1951(b)(1) and (b)(3), in that the defendant did unlawfully take and obtain the property of Subway, located at 14455 Cullen Boulevard, Houston, Texas, which was in the possession and custody of an employee of Subway, namely, United States currency, by means of actual and threatened force, violence, and fear of injury to those in lawful possession of those items.

In violation of Title 18, United States Code, §§ 1951(a).

COUNT FOUR

Title 18, United States Code, §§ 924 (c)(1)(A) -
Use, carry and brandish of a firearm during and in relation to a crime of violence

On or about July 14, 2019, in the Houston Division of the Southern District of Texas,

JAMES RAY BUNN

herein defendant, did knowingly carry, use and brandish a firearm, namely, a handgun, during and in relationship to a crime of violence for which he may be prosecuted in a court of the United States, that being Interference with Commerce by Robbery, as alleged in Count Three.

In violation of Title 18, United States Code, §§ 924(c)(1)(A)(ii),(3)(A).

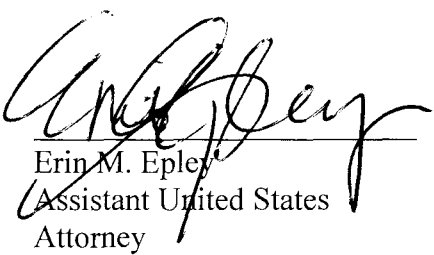
A TRUE BILL:

ORIGINAL SIGNATURE ON FILE

FOREMAN OF THE GRAND JURY _____

RYAN K. PATRICK
United States Attorney

BY:


Erin M. Epley
Assistant United States
Attorney